Earth Systems
Environmental Engineering

August 20, 2021

Via Email/Sharefile

Mr. Sam Abdellatif
Land and Redevelopment Programs Branch
US Environmental Protection Agency Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Re: SI Comment Letter Response – July 20, 2021
Hess Corporation Former Port Reading Complex (HC-PR)
750 Cliff Road
Woodbridge, Middlesex County, New Jersey
NJDEP PI# 006148
ISRA Case No. E20130449
EPA ID No. NJD045445483

Dear Mr. Abdellatif:

Earth Systems, Inc. (Earth Systems) has prepared this letter on behalf of Hess Corporation (Hess) regarding the July 20, 2021 comment letter provided by the New Jersey Department of Environmental Protection (NJDEP) and Environmental Protection Agency (EPA) relating to the Site Investigation Report Response to Comments (RTC) submitted on November 17, 2020. Please note that a meeting was held on August 16, 2021 between Hess, Earth Systems, and NJDEP to discuss this comment letter.

NJDEP Comments & Earth Systems/Hess Responses

NJDEP Comment 1: The Department's September 27, 2016 – Section 7 review of the 2015 SIR identified that there may be COCs that were part of petroleum processing, wastes, and/or wastewaters that may not be characterized by standard remedial investigation analyses. Consistent with N.J.A.C. 7:26E- 2.1(c)1, the responsible party is required to ensure that analyses reflect the potential COCs in an area of concern. The Department considered the potential for additional analytical methods to be applicable to former petroleum processing, waste/wastewater management areas and/or systems, gasoline additives and alcohol areas. AOC 14a and 14b was identified as an AOC due to gasoline additives storage (e.g., TBA, MTBE, TAME) and any other additives, as well as the storage of methanol and petroleum processing materials (raffinate, sour water)

identified in the 2006 SIR/RIW.

The Department has already identified the analytical methods for alcohols for methanol and/or ethanol transfer and storage areas (USEPA Method 8015B-direct injection) and PFAS for the firefighting training/storage areas (USEPA Method 537 – modified) as applicable to some areas of the facility where a release may not or will not be characterized by TCL VOC/SVOC + TICs. 1,4-dioxane investigation sample analyses need to consider the SW-846 USEPA Method 8270 SVOC SIM (selected ion monitoring) with isotope dilution GC/MS (https://14d-1.itrcweb.org/wp-content/uploads/2020/05/Sampling-and-Analysis-Final.pdf - see Table 2) to achieve the GWQS of 0.4 ug/L. Any other potential process related raw materials and/or waste/wastewater constituents need to be considered in determining analytical methods to characterize site impacts from a release.

Earth Systems Response 1: As discussed during the above referenced August 16, 2021 meeting, groundwater samples collected from the former refinery area will be analyzed by running the TCL VOC + TICs list utilizing USEPA Method 8015B-direct injection, in addition to utilizing method SW846/8260D. Also, a review of refinery processes will be conducted to determine that the proposed groundwater analysis will capture all potential analytes.

Groundwater samples that are analyzed for the TCL SVOC + TICs list are always analyzed utilizing method SW846/8270E SIM in order to achieve the correct method detection limits.

NJDEP Comment 2: Materials storage outside of AOC 5 will need to be characterized pursuant to N.J.A.C. 7:26E- 2.1(c)1 (below). One specific Department concern was whether materials stored outside of AOC 5 included materials waiting to be placed within AOC 5, e.g., catalyst fines. Characterization sampling of COCs associated with materials staged outside of AOC 5 will help in the investigation of ground water, and AOC 12 surface water, sediment, and ecological investigations.

> "N.J.A.C. 7:26E-2.1(c):
>
> (c) The following requirements apply for selection of analytical parameters for all environmental media:
>
> 1. Samples for all environmental media shall be analyzed for:
>
> i. The contaminants that may be present as determined during the preliminary assessment and/or from any other information obtained during the remediation; or
>
> ii. The Target Compound List plus TICs/Target Analyte List (TCL + TICs/TAL), hexavalent chromium, extractable petroleum hydrocarbons (EPH), and pH when contaminants are unknown or not well documented;"

Earth Systems Response 2: The areas adjacent to AOC 5 are currently being investigated as part of the investigation of AOC 12 – Smith Creek and the Detention Basin. Samples collected in these areas will be analyzed for Extractable Petroleum Hydrocarbons (EPH), TCL VOC/SVOC+ TICs, metals, and pH.

Should you have any questions or require additional clarification or information, please contact me at 732-739-6444 or via e-mail at ablake@earthsys.net. If you have any questions relating to the project and schedule moving forward, you can also contact Mr. John Schenkewitz of Hess Corporation at 609-406-3969.

Sincerely,

Amy Blake
Sr. Project Manager

c. Ms. Julia Galayda, NJDEP Case Manager (via email/Sharefile)
Mr. John Schenkewitz – Hess Corporation (via e-mail)
Mr. Rick Ofsanko – Earth Systems (via e-mail)
Mr. John Virgie – Earth Systems (via e-mail)